

Plaintiff Securities and Exchange Commission (the “SEC”) and Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants”) (together, with the SEC, the “Parties”) respectfully file this joint motion for a 45-day stay of this case in light of recent discussions between the Parties to resolve this litigation. In support of the motion, the Parties state as follows:

1. Recently, the Parties have reached a potential resolution of this matter. However, that potential resolution requires the formal approval of the SEC's Commissioners.
2. Counsel for the SEC will circulate the proposed resolution of this matter to the SEC's Commissioners for their review and decision. Given the press of other matters before the SEC's Commissioners, this process is expected to take several weeks.
3. Under the Court's most recent scheduling order, among other things, Defendants'

summary judgment motion is due by March 21, 2025, and the SEC's summary judgment motion and response to Defendants' summary judgment motion are due by April 29, 2025. *See* Dkt. No. 186.

4. The Parties agree that to avoid additional fees, costs, and burdens associated with briefing of the Parties' summary judgment motions, and to conserve judicial resources relating to the review of summary judgment briefing, it would be preferable, and more efficient, to defer any further proceedings in this matter until after the SEC's Commissioners review and decide on the Parties' proposed resolution of this case. Accordingly, the Parties jointly request that this case be stayed for 45 days to April 21, 2025 and the briefing schedule set forth in Dkt. No. 186 be vacated. If the Parties are unable to finalize a resolution by April 21, the Parties will contact the Court at that time to propose a new schedule for summary judgment briefing.

WHEREFORE, the Parties respectfully move the Court for a 45-day stay of this case, vacatur of the briefing schedule set forth in Dkt. No. 186, and for such other and further relief as this Court deems just.

Respectfully submitted,

/s/ Eric M. Phillips

Eric M. Phillips
Christopher H White
Regina LaMonica
U.S. Securities and Exchange Commission
175 West Jackson Boulevard, Suite 1450
Chicago, IL 60604
Telephone: (312) 353-7390
Email: phillipse@sec.gov

Counsel for Plaintiff

DATED: March 10, 2025

/s/ Marshall R. King

Helgi C. Walker*
Brian A. Richman*
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Ave. NW
Washington, DC 20036
Telephone: (202) 955-8500
Email: hwalker@gibsondunn.com

Marshall R. King*
M. Jonathan Seibald*
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-3905
Email: mking@gibsondunn.com

Michael J. Diver
Elliott M. Bacon
KATTEN MUCHIN ROSENMAN LLP
525 West Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
Email: Michael.diver@kattenlaw.com

Counsel for Defendants

** Pro hac vice*